

COUNSEL LISTED ON LAST PAGES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Nichia Corporation

Case No: 3:06-CV-00162-MMC (JCS)

Plaintiff,

**JOINT ADMINISTRATIVE REQUEST
TO EXTEND TIME TO FILE MOTIONS
TO COMPEL AND ORDER THEREON**

Seoul Semiconductor Co., Ltd. and Seoul Semiconductor, Inc.,

Judge: Maxine M. Chesney
Magistrate Judge: Joseph C. Spero

Defendants.

Seoul Semiconductor Co., Ltd. and Seoul Semiconductor, Inc.,

Judge: Maxine M. Chesney
Magistrate Judge: Joseph C. Spero

Plaintiff Nichia Corporation (“Nichia”) and Defendants Seoul Semiconductor Co., Ltd., Seoul Semiconductor Inc., (collectively “Seoul”), file this joint administrative request for extension of the deadline to file motions to compel documents pursuant to The United States District Court for the Northern District of California Local Rule (“L.R.”) 7-11.

1. PROCEDURE

To make an administrative request under Local Rule 7-11, a moving party or parties must set forth specifically the action requested, and the reasons supporting the motion. Such a motion must be accompanied by either (a) a stipulation of parties under L.R. 7-12 or, (b) by a declaration explaining why such a stipulation could not be reached.

2. ACTION REQUESTED

Plaintiff and Defendants respectfully request that the District Court allow for a brief reprieve in the discovery deadlines. Specifically, the parties jointly request an extension of the deadline to file motions to compel documents from today (April 24, 2007) to Wednesday, April 25, 2007. There are several issues of contention between the parties, but one more day to work them out may obviate the need for a joint letter or motion.

The Court has previously modified the deadline to file motions to compel documents

1 related to damages only to April 24, 2007. *See* Orders (Dkt. Nos. 210, 218 and 228). Whether
 2 the deadline to file motions to compel non-damages related documents has passed is one issue in
 3 contention between the parties. The parties jointly make this request expressly reserving their
 4 right to address the deadline to file motions to compel non-damages related documents.

5 **3. REASONS SUPPORTING THIS REQUEST**

6 Both parties have been working diligently to identify and produce all necessary
 7 documents. This is a slow process, as the parties are in Japan and Korea, respectively.
 8 Translation and review of thousands of documents in many different languages have caused
 9 delay in this process. The parties have reached agreement on most issues surrounding the
 10 production of documents, but need just a bit more time.

11 **4. STIPULATION**

12 By signing this joint administrative request, all parties act in concert in requesting the
 13 District Court Judge move the deadline to file motions to compel documents only as described
 14 above in Section 2.

15 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

16 Dated: April 24, 2007

17 By: _____ /s/ Michael J. Song

18 Michael J. Song (CA Bar No. 243675)
 19 Foley & Lardner LLP
 20 1530 Page Mill Road
 21 Palo Alto, CA 94304-1125
 22 Telephone: (650) 856-3700
 Facsimile: (650) 856-3710
 msong@foley.com

23 Kenneth E. Krosin (admitted *pro hac vice*)
 24 Michael D. Kaminski (admitted *pro hac vice*)
 Linda E.B. Hansen (admitted *pro hac vice*)
 Foley & Lardner LLP
 25 3000 K Street, N.W., Suite 500
 26 Washington, D.C. 20007-5143
 Telephone: (202) 672-5300
 Facsimile: (202) 672-5399
 kkrosin@foley.com

1 mkaminski@foley.com
2 ssnader@foley.com

3 Attorneys for Plaintiff Nichia Corporation

4
5 DATED: April 24, 2007

By: _____/s/ Beth H. Parker

6 Beth H. Parker (CA Bar No. 104773)
7 Judith S. H. Hom (CA Bar No. 203482)
8 Tom Clifford (CA Bar No. 233394)
9 Bingham McCutchen LLP
10 Three Embarcadero Center
11 San Francisco, California 94111-4067
12 Telephone: (415) 393-2000
13 Facsimile: (415) 393-2286
14 beth.parker@bingham.com
15 judith.hom@bingham.com
16 tom.clifford@bingham.com

17
18 Attorneys for Defendants Seoul Semiconductor Co.,
19 Ltd. and Seoul Semiconductor Inc.

20
21
22
23
24
25
26
27
28

~~PROPOSED ORDER~~

PURSUANT TO STIPULATION, IT IS SO ORDERED. The deadline to file motions to compel or joint letters shall be extended to Wednesday, April 25, 2007.

DATED: April 25, 2007

By:

Maxine M. Chesney
HONORABLE MAXINE M. CHESNEY
United States District Judge